IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

PATRICIA MENGESHA individually and on behalf of all others similarly situated,

Plaintiff,

v.

Bitconnect International PLC, Bitconnect LTD, and BitConnect Trading Ltd,

Defendants.

Court File No. 0:18-cv-279-WMW-SER

THE BITCONNECT INVESTOR GROUP'S NOTICE OF MOTION AND MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL

Pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 77z-1(a)(3)(B), Movants Albert Parks and Faramarz Shemirani (the "BitConnect Investor Group" or "Group"), through their counsel, hereby moves this Court for an Order (attached hereto): (i) appointing the BitConnect Investor Group as Lead Plaintiff in the above-captioned action; and (ii) approving the Group's selection of the law firms Levi & Korsinsky, LLP and Silver Miller as Co-Lead Counsel and Hellmuth & Johnson PLLC at Liaison Counsel. In support of this Motion, the Group submits herewith a Memorandum of Law and the Declaration of Russell M. Spence, Jr., dated April 13, 2018.

Dated: April 13, 2018

Respectfully submitted,

HELLMUTH & JOHNSON, PLLC

By: <u>s/Russell M. Spence</u>, <u>Jr.</u>

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